

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND

COMPASS MARKETING, INC.

*Plaintiff,*

v.

FLYWHEEL DIGITAL LLC, JAMES  
COLUMBUS “CHIP” DIPAULA, JR.,  
PATRICK MILLER, DANIEL WHITE,  
MICHAEL WHITE, GEORGE WHITE and  
ASCENTIAL PLC,

*Defendants.*

Case Number: 1:22-cv-00379

**STIPULATION EXTENDING PLEADING AND MOTION DEADLINES BY AND  
AMONG PLAINTIFF COMPASS AND DEFENDANTS ASCENTIAL, FLYWHEEL,  
DIPAULA, AND MILLER**

IT IS HEREBY STIPULATED AND AGREED by and between Plaintiff Compass Marketing, Inc. (“Plaintiff”) and Defendants Ascential PLC, Flywheel Digital LLC, James Columbus “Chip” DiPaula, Jr., and Patrick Miller (collectively, the “Defendants”), pursuant to Federal Rule of Civil Procedure 6(b) and Local Rule 105 that:

1. On April 4, 2022, the Defendants filed a motion to dismiss (“the Motion to Dismiss”) Plaintiff’s complaint (“the Complaint”) (ECF 23).

2. If Plaintiff responds in opposition to the Motion to Dismiss, the parties stipulate that Plaintiff’s response deadline is extended from April 18, 2022 to May 4, 2022; and that the Defendants’ reply deadline is extended from May 2, 2022 to May 25, 2022.

3. Alternatively, if Plaintiff files an amended complaint, it will do so on May 4, 2022, and thereafter the Defendants will have until June 6, 2022 to file a responsive pleading or motion. If the Defendants file a motion to dismiss the amended complaint, the parties agree that Plaintiff

will have until July 6, 2022 to file its response, and Defendants will have until July 27, 2022 to file their reply.

4. Good cause exists for the agreed extensions because both Plaintiff's Complaint and Defendants' Motion to Dismiss briefing are extensive, and the instant stipulation seeks by agreement to ensure that both Plaintiff and Defendants have sufficient time to review, analyze and draft measured and thorough work product for the Court's consideration.

5. It is further stipulated and agreed that these extensions do not constitute a waiver of any claim, right, or defense.

6. The requested extensions will not affect any deadlines in this case because a scheduling order has not been issued.

Dated: April 6, 2022

**MORGAN, LEWIS & BOCKIUS LLP**

/s/ Troy S. Brown, Esq.

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Respectfully submitted,

**VENABLE LLP**

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SO ORDERED.

Dated:

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The Honorable James K. Bredar, Chief Judge